

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**WSOU INVESTMENTS, LLC d/b/a,
BRAZOS LICENSING AND
DEVELOPMENT**

Plaintiff,
V.

GOOGLE LLC,

Defendant.

Civil Case No. 6:20-cv-585-ADA

JURY TRIAL DEMANDED

DECLARATION OF BRANDON ERVIN

I, Brandon Ervin, a fact witness in the above-captioned action have been informed of and understand that:

1. WSOU Investments, LLC d/b/a Brazos License and Development (“WSOU”) and Google LLC (“Google”) may take my deposition pursuant to Federal Rules of Civil Procedure.
2. During the deposition, I may be assisted by my own counsel.
3. I currently live and work in Switzerland, and will voluntarily appear at the Swiss offices of Quinn Emanuel at Dufourstrasse 29, 8008 Zurich, Switzerland or, if required, at another location in the canton of Zurich, Switzerland, for the purpose of this deposition.
4. I am not obligated to appear and participate in the deposition and cannot be subjected to any coercive measures.
5. By being deposed in the canton of Zurich, Switzerland, I have been apprised that I have rights under Swiss law.

6. At any time during examination, I may invoke any right or duty to refuse testimony under Swiss Law. I understand that my rights to refuse testimony are set out in particular in Articles 165-166 of the Swiss Code of Civil Procedure.
7. At any time during examination, I may also invoke any right or duty to refuse testimony under U.S. Law. In particular, I understand that I am entitled to refuse to answer any question pertaining to/or which may invoke attorney-client privilege and/or attorney work-product.
8. The Swiss Commissioner in this matter, Olivier Buff, with address at Quinn Emanuel Urquhart Sullivan (Schweiz) GmbH, Dufourstrasse 29, 8008 Zurich, Switzerland, will serve as my agent of service ("*Domizilhalter*") in Switzerland in this matter. Thus, any correspondence from the US or Swiss authorities may validly be delivered to Olivier Buff, and he will then forward to me.

In view of the above, I hereby consent to having my deposition taken in the above-captioned matter by oral examination in the English language under oath, recorded by video and stenography, at a date to be determined.

I confirm that I am cooperating of my own accord.

DATED: _____



BRANDON ERVIN